

Exhibit 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

MARC VEASEY, JANE HAMILTON, SERGIO DELEON,
FLOYD J. CARRIER, ANNA BURNS, MICHAEL MONTEZ,
PENNY POPE, OSCAR ORTIZ, KOBY OZIAS, JOHN
MELLOR-CRUMLEY, JANE DOE, JOHN DOE, LEAGUE OF
UNITED LATIN AMERICAN CITIZENS (LULAC), AND
DALLAS COUNTY, TEXAS,

Plaintiffs,

v.

RICK PERRY, Governor of Texas; and JOHN STEEN, Texas
Secretary of State

Defendants.

CIVIL ACTION NO.
2:13-CV-193 (NGR)
[Lead case]

UNITED STATES OF AMERICA,

Plaintiffs,

TEXAS LEAGUE OF YOUNG VOTERS EDUCATION
FUND; IMANI CLARK; AURICA WASHINGTON;
CRYSTAL OWENS; AND MICHELLE BESSIAKE,

Plaintiffs-Intervenors,

TEXAS ASSOCIATION OF HISPANIC COUNTY JUDGES
AND COUNTY COMMISSIONERS and MARIA LONGORIA
BENEVIDES,

Plaintiffs-Intervenors,

v.

STATE OF TEXAS, JOHN STEEN, in his official capacity as
Texas Secretary of State; and STEVE McCRAW, in his official
capacity as Director of the Texas Department of Public Safety,

Defendants.

CIVIL ACTION NO.
2:13-CV-263 (NGR)
[Consolidated case]

TEXAS STATE CONFERENCE OF NAACP BRANCHES;
and the MEXICAN AMERICAN LEGISLATIVE CAUCUS OF
THE TEXAS HOUSE OF REPRESENTATIVES,

Plaintiffs,

v.

JOHN STEEN, in his official capacity as Secretary of State of
Texas; and STEVE McCRAW, in his official capacity as
Director of the Texas Department of Public Safety,

Defendants.

CIVIL ACTION NO.
2:13-CV-291 (NGR)
[Consolidated case]

**PLAINTIFFS TEXAS NAACP AND MALC'S
INITIAL DISCLOSURES PURSUANT TO RULE 26**

Pursuant to Federal Rule of Civil Procedure 26(a), Plaintiffs Texas State Conference of NAACP Branches ("Texas NAACP) and the Mexican American Legislative Caucus of the Texas House of Representatives ("MALC"), (collectively "Texas NAACP/MALC Plaintiffs"), hereby make their following initial disclosures:

A. Individuals Likely to Have Discoverable Information

The following individuals are likely to have discoverable information that the Texas NAACP/MALC Plaintiffs may use to support their claims or defenses (not including information used solely for impeachment).

1. Individuals affiliated with the Texas NAACP who have information regarding the discriminatory purpose and retrogressive effect of the voting changes at issue in this litigation (the "Voting Changes") and who may be contacted through undersigned counsel for the NAACP/MALC Plaintiffs, including:

- (a) Rev. Larry Brown, Waco NAACP President
- (b) Ericka Cain, Texas State NAACP Youth Advisor
- (c) Vernon Denmon, Former Palestine NAACP President

- (d) TaNeika Driver, Killeen NAACP President
- (e) Shirley Fanuiel, State NAACP Area Coordinator
- (f) Claude Foster, Former Reg. Director NAACP
- (g) Obie Greenleaf, Former Vice-President of the Sherman-Denison NAACP and Former Member of the City Council
- (h) Oliver Hill, San Antonio NAACP President
- (i) Howard Jefferson, Houston, State NAACP Political Action Chairperson & National Board Member
- (j) Phyllis Jones, State NAACP Education Chair
- (k) Bill Leak, Temple NAACP President
- (l) Nelson Linder, Austin NAACP President
- (m) Bob Lydia, NAACP National Board and State NAACP 1st Vice President
- (n) David Miller, Galveston Branch President
- (o) Terry Mills, State NAACP Treasurer and Corpus Christi NAACP
- (p) Carol Moore, State NAACP Health Chair
- (q) Goodwille Pierre, NAACP Member, Candidate for District Judge in Harris County
- (r) Leonard Rockwell, First Vice President of Mt. Pleasant NAACP
- (s) Brian Rowland, State NAACP Assistant Treasurer and Councilperson City of Prairie View
- (t) Carolyn Scantlebury, State NAACP Housing Chair
- (u) Yolanda Smith, Executive Director of the Houston NAACP Branch
- (v) Robert Starr, Former NAACP Board Member
- (w) Jeffrey W. Travillion, Sr., State NAACP Press and Publicity Chair and Former Austin NAACP President
- (x) Dr. Juanita Wallace, Dallas NAACP President
- (y) Carmen Watkins, Regional Director NAACP

(z) Dr. Richard Watkins, State NAACP Criminal Justice Chairperson

2. Individuals affiliated with MALC who have information regarding the discriminatory purpose and retrogressive effect of the Voting Changes and who may be contacted through undersigned counsel for the NAACP/MALC Plaintiffs, including:

- (a) Texas Representative Trey Martinez Fischer
- (b) Texas Representative Armando Martinez
- (c) Texas Representative Rafael Anchia
- (d) Texas Representative Roland Gutierrez

3. Texas residents who may have information regarding (i) voting problems and/or difficulties experienced at polling locations and (ii) difficulties obtaining the photo identification required by SB 14, including:

- (a) Grady Castleberry
281-960-9217
- (b) Etta Crockett
832-969-0963
- (c) Sylvester Turner
- (d) Terri Dukes-John
512-293-4900

4. Texas county voter registration officials, including but not limited to clerks, assessors, judges, sheriffs, treasurers, and staff of all of the foregoing, who may have information regarding (i) the legislative history, discriminatory purpose, and/or retrogressive effect of the Voting Changes, (ii) voter registration activities, data, and procedures, (iii) voting and voter data, (iv) voting problems and alleged voting or voter fraud, (v) provisional ballots cast and counting procedures, (vi) accessibility of the office to the public, (vii) training received by poll workers, and (viii) directives, training, and guidance provided by the Secretary of State on the implementation of SB-14.

5. Texas county employees with election duties, including but not limited to clerks, assessors, judges, sheriffs, treasurers, and staff of all of the foregoing, who may have information regarding (i) the legislative history, discriminatory purpose, and/or retrogressive effect of the Voting Changes, (ii) voter registration activities, data, and procedures, (iii) voting and voter data, (iv) voting problems and alleged voting or voter fraud, (v) provisional ballot counting procedures, (vi) accessibility of the office to the public, and (vii) training received by poll workers.

6. Individuals affiliated with the Texas Secretary of State's Election Division who may have information regarding (i) the legislative history, discriminatory purpose, and/or retrogressive effect of the Voting Changes, (ii) voter registration activities, data, and procedures, (iii) voting and voter data, (iv) voting problems and alleged voting or voter fraud, (v) provisional ballot counting procedures, (vi) accessibility of the office to the public, (vii) directives, training, and guidance provided to poll workers and election officials by the Texas Secretary of State's Elections Division, (viii) the Texas Secretary of State's plans and actions related to educating Texas voters about the Voting Changes; and (ix) the TEAM system, including, but not limited to Secretary of State John Steen, who may be contacted at P.O. Box 12887, Austin, Texas 78711.

7. Individuals affiliated with the Texas Office of the Governor who may have information regarding (i) the legislative history, discriminatory purpose, and/or retrogressive effect of the Voting Changes, (ii) voter registration activities, data, and procedures, (iii) voting and voter data, and (iv) voting problems and alleged voting or voter fraud, including but not limited to Governor Rick Perry, who may be contacted at P.O. Box 12428, Austin, Texas 78711.

8. Individuals affiliated with the Texas Office of the Lieutenant Governor who may have information regarding (i) the legislative history, discriminatory purpose, and/or

retrogressive effect of the Voting Changes, (ii) voter registration activities, data, and procedures, (iii) voting and voter data, and (iv) voting problems and alleged voting or voter fraud, including but not limited to Lieutenant Governor David Dewhurst, who may be contacted at P.O. Box 12068, Austin, Texas 78711.

9. Individuals affiliated with the Texas Department of Public Safety (“DPS”) who may have information regarding: (i) the legislative history, discriminatory purpose, and/or retrogressive effect of the Voting Changes, (ii) voter registration activities, data, and procedures, (iii) the number of persons in Texas who are likely to possess DPS-issued ID that is acceptable to vote under SB-14; (iv) the DPS’s plans and actions related to educating Texas’s voters about the Voting Changes; (v) and the accessibility of DPS License- and ID-issuing offices, including mobile ID-issuing offices.

10. Members of the Texas House of Representatives who may have information regarding the legislative history, discriminatory purpose, and/or retrogressive effect of the Voting Changes, and who may (except for members of MALC, who are identified at <http://malc.org/membership/member-pages/>) be contacted at P.O. Box 2910, Austin, Texas 78768.

11. Members of the Texas Senate who may have information regarding the legislative history, discriminatory purpose, and/or retrogressive effect of the Voting Changes, and who may (except for members of MALC, who are identified at <http://malc.org/membership/member-pages/>) be contacted at P.O. Box 12068, Capitol Station, Austin, Texas 78711.

12. Legislative staffers for the Texas House of Representatives who may have information regarding the legislative history, discriminatory purpose, and/or retrogressive effect of the Voting Changes, and who may be contacted at P.O. Box 2910, Austin, Texas 78768,

including, but not limited to, Elizabeth Zornes, Chief of Staff to Texas Representative Rafael Anchia

13. Legislative staffers for the Texas Senate who may have information regarding the legislative history, discriminatory purpose, and/or retrogressive effect of the Voting Changes, and who may be contacted at P.O. Box 12068, Capitol Station, Austin, Texas 78711, including, but not limited to, Brandon Dudley, Chief of Staff for Texas Senator Rodney Ellis.

14. Individuals who appeared on the witness list on March 1, 2011 before the Texas House of Representatives Committee who may have information regarding the legislative history, discriminatory purpose, and/or retrogressive effect of the Voting Changes.

15. Individuals who appeared on the witness list on January 25, 2011 before the Texas Senate Committee who may have information regarding the legislative history, discriminatory purpose, and/or retrogressive effect of the Voting Changes.

16. Third-party voter registration organizations who have not yet been identified and who may have information about the discriminatory purpose and retrogressive impact of the Voting Changes, the manner in which voter registration activities are undertaken, and the specific minority groups that the organizations reach.

17. Expert Witnesses, to be identified pursuant to the Court's Scheduling Order.

18. Individuals identified by Marc Veasey, Jane Hamilton, Sergio Deleon, Floyd J. Carrier, Anna Burns, Michael Montez, Penny Pope, Oscar Ortiz, Koby Ozias, John Mellor-Crumley, Jane Doe, John Doe, League of United Latin American Citizens, and Dallas County, Texas.

19. Individuals identified by the United States and Attorney General.

20. Individuals identified by the League of Young Voters Education Fund, Imani Clark, Aurica Washington; Crystal Owens; and Michelle Bessiake.

21. Individuals identified by the Texas Association of Hispanic County Judges and County Commissioners.

22. Individuals identified by the State of Texas, Rick Perry, John Steen, and Steve McCraw.

23. Individuals identified by True The Vote.

24. Individuals identified by Belinda Ortiz, Lenard Taylor, Eulalio Mendez Jr., Lionel Estrada, Estela Garcia Espinosa, Roxsanne Hernandez, Lydia Lara, Margarito Martinez Lara, Maximina Martinez Lara, and La Union Del Pueblo Entero, Inc.

B. Documents

Texas NAACP/MALC Plaintiffs may use the following documents, electronically stored information, or tangible things, all of which are maintained by the Texas NAACP/MALC Plaintiffs at their respective locations or are publicly available, to support their claims or defenses:

1. Organizational mission statements.
2. Bylaws.
3. Memoranda, minutes, and other organizational documents relating to voter registration policies and activities and/or voting in Texas.
4. Documents regarding organizational relationships with affiliates and member groups.
5. Manuals, brochures, and guides detailing election administration activity, training, and/or protocols.

6. Correspondence regarding election administration policies and activities and/or voting in Texas.

7. Correspondence regarding the Voting Changes.

8. Organizational correspondence with the State of Texas.

9. Written testimony offered during legislative or rulemaking hearings.

10. Press releases, newsletters, and other public statements regarding the Voting Changes and related regulations and provisions.

11. The Section 5 Comment Letters submitted to the Justice Department related to Texas Senate Bill 14, S.B. 14, 2011 Leg. Sess. 82(R) (TX. 2011) (“Texas Senate Bill 14”) and the documents cited therein.

12. Documents tendered to the Texas Legislature by third parties, including but not limited to lobbyists, regarding the Voting Changes and/or Texas Senate Bill 14.

C. Computation of Damages

Texas NAACP/MALC Plaintiffs are not seeking damages. Texas NAACP/MALC Plaintiffs do reserve the right, however, to seek reimbursement for reasonable attorneys’ fees, litigation expenses (including expert witness fees and expenses), and costs.

D. Insurance Agreements

Texas NAACP/MALC Plaintiffs are not aware of any insurance agreement relevant to this action.

Texas NAACP/MALC Plaintiffs reserve the right to supplement the foregoing as additional information is learned through discovery or otherwise.

Dated: November 21, 2013

/s/ Ezra D. Rosenberg

Ezra D. Rosenberg
Dechert LLP
902 Carnegie Center, Suite 500
Princeton, New Jersey 08540-6531
(609) 955 3222 (phone)
ezra.rosenberg@dechert.com

Steven B. Weisburd
State Bar No. 24054515
S.D. Tex. ID 1691215
Amy L. Rudd
State Bar No. 24043561
S.D. Tex. ID 1149768
Lindsey B. Stelcen
State Bar No. 24083903
Dechert LLP
500 W. 6th Street, Suite 2010
Austin, TX 78701
Telephone: (512) 394-3000
Facsimile: (512) 394-3001
Lindsey.stelcen@dechert.com

Gary Bledsoe
State Bar No.: 02476500
PotterBledsoe, L.L.P.
316 West 12th Street, Suite 307
Austin, Texas 78701
Telephone: (512) 322-9992
Facsimile: (512) 322-0840
garybledsoe@sbcglobal.net

Robert A. Kengle
Mark A. Posner
Sonia Gill
Erandi Zamora
Lawyers' Committee for Civil Rights Under Law
1401 New York Ave., NW, Suite 400
Washington, D.C. 20005
(202) 662-8389 (phone)
bkengle@lawyerscommittee.org
mposner@lawyerscommittee.org
sgill@lawyerscommittee.org
ezamora@lawyerscommittee.org

Wendy Weiser
Myrna Pérez
Vishal Agraharkar
Jennifer Clark
The Brennan Center for Justice at NYU Law School
161 Avenue of the Americas, Floor 12
New York, New York 10013-1205
(646) 292-8329 (phone)
wendy.weiser@nyu.edu
myrna.perez@nyu.edu
vishal.agraharkar@nyu.edu
jenniferl.clark@nyu.edu

Kim Keenan
Marshall Taylor
Victor Goode
Victor L. Goode
State Bar No. 08145525
NAACP National Headquarters
4805 Mt. Hope Dr.
Baltimore, Maryland 21215-3297
(410) 580-5120 (phone)
vgoode@naacpnet.org

Jose Garza
Law Office of Jose Garza
State Bar No. 07731950
7414 Robin Rest Drive
San Antonio, Texas 98209
Telephone: (210) 392-2856
garzapalm@aol.com

Robert S. Notzon
State Bar No. 00797934
Law Office of Robert S. Notzon
1502 West Avenue
Austin, Texas 78701
512-474-7563 (phone)
Robert@notzonlaw.com

Clay Bonilla
State Bar No. 24055193
S.D. Tex. ID 596241
Daniel G. Covich
State Bar No. 04906500
S.D. Tex. ID 10706
The Law Offices of William Bonilla, P.C.
2727 Morgan Ave.
Corpus Christi, Texas 78405

Counsel for Plaintiffs
Texas State Conference of NAACP Branches and the
Mexican American Legislative Caucus of the Texas
House of Representatives

CERTIFICATE OF SERVICE

I certify that on November 21, 2013, the foregoing Initial Disclosures were sent by electronic mail to the following Counsel for Plaintiffs, Defendants, and Plaintiffs-Intervenors.

/s/ Lindsey Stelcen
Lindsey Stelcen

John Scott
Office of the Attorney General of Texas
P.O. Box 12548 (MC 059)
Austin, TX 78711-2548
john.scott@texasattorneygeneral.gov
Counsel for Defendants

Meredith Bell-Platts
Elizabeth S. Westfall
Jennifer L. Maranzano
Daniel J. Freeman
Anna Baldwin
Voting Section, Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Ave. NW
Washington, DC 20530
(202) 305-4278 (phone)
meredith.bell-platts@usdoj.gov
elizabeth.westfall@usdoj.gov
jennifer.maranzano@usdoj.gov
daniel.freeman@usdoj.gov
anna.baldwin@usdoj.gov
Counsel for Plaintiff United States of America

John Albert Smith, III
Office of the U.S. Attorney
800 N Shoreline Blvd Ste 500
Corpus Christi, TX 78401
361-888-3111 (phone)
john.a.smith@usdoj.gov
Counsel for Plaintiff United States of America

Chad W. Dunn
Kembel Scott Brazil
Brazil & Dunn
4201 Cypress Creek Pkwy., Suite 530
Houston, TX 77068
281-580-6310 (phone)
chad@brazilanddunn.com
scott@brazilanddunn.com
Counsel for Veasey Plaintiffs

J. Gerald Hebert
Campaign Legal Center
215 E. Street, NE
Washington, D.C. 20002
202-736-2200 ext. 12 (phone)
202-736-2222
GHebert@campaignlegalcenter.org
Counsel for Veasey Plaintiffs

Armand Derfner
P.O. Box 600
Charleston, SC 29402
843-723-9804 (phone)
aderfner@dawlegal.com

Neil G. Baron
914 FM 517 Rd W Suite 242
Dickinson, TX 77539
281-534-2748 (phone)
neil@ngbaronlaw.com
Counsel for Veasey Plaintiffs

Luis Roberto Vera, Jr.
111 Soledad Ste 1325
San Antonio, TX 78205
210-225-3300 (phone)
lrvlaw@sbcglobal.net
Counsel for Plaintiff League of United Latin American Citizens

Christina A. Swarns
Ryan Haygood
Natasha M. Korgaonkar
Leah C. Aden
NAACP Legal Defense and Educational Fund, Inc.
40 Rector St 5th Floor
New York, NY 10006
212-965-2200 (phone)
cswarns@naacpldf.org
laden@naacpldf.org
nkorgaonkar@naacpldf.org
rhaygood@naacpldf.org
Counsel for Plaintiffs Texas League of Young Voters Education Fund and Imani Clark

Rolando L. Rios
115 E Travis Ste 1645
San Antonio, TX 78205
210-222-2102 (phone)
rrios@rolandorioslaw.com
Counsel for Plaintiffs Texas Assoc. Of Hispanic County Judges and County Commissioners

Danielle Conley
Jonathan E. Paikin
Kelly Dunbar
Sonya Lebsack
Wilmer Hale
1875 Pennsylvania Avenue NW
Washington, DC 20006
202-663-6703 (phone)
danielle.conley@wilmerhale.com
jonathan.paikin@wilmerhale.com
kelly.dunbar@wilmerhale.com
sonya.lebsack@wilmerhale.com
Counsel for Plaintiffs Texas League of Young Voters Education Fund and Imani Clark

Joseph M Nixon
Bierne Maynard & Parsons
1300 Post Oak Blvd Ste 2500
Houston, TX 77056
713-871-6809 / Fax: 713-960-1527
jnixon@bmpllp.com
Counsel for Proposed Plaintiff-Intervenors True The Vote

Robert M. Allensworth
B14522
BMRCC 251 N IL 37 S
Ina, IL 62846-2419
PRO SE